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7 AT SEATTLE
8 CLERK U.S. DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 BY DEPUTY
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12 UNITED STATES DISTRICT COURT
13 WESTERN DISTRICT OF WASHINGTON
14 AT TACOMA

15 UNITED STATES OF AMERICA, }
16 Plaintiff, }
17 v. }
18 BARBARA JO ERICSSON, }
19 a/k/a Barbara Jo Fulton, }
20 Defendant. }

21 NO. CR 11-5280 RJB
22 INFORMATION
23 (Felony)

24 The United States Attorney charges that:

25 **COUNTS ONE THROUGH THREE**
26 **(Bank Fraud)**

27 **A. The Scheme and Artifice to Defraud**

28 1. Beginning at a time unknown, but in or about February 2004, and
continuing through on or about April 26, 2010, in Thurston County, within the Western
District of Washington, and elsewhere, defendant BARBARA JO ERICSSON, also
known as Barbara Jo Fulton, did knowingly and willfully devise and execute a scheme
and artifice to defraud KeyBank National Association (Key Bank), a financial institution
as defined by Title 18, United States Code, Section 20, and to obtain moneys, funds, and
credits under the custody and control of Key Bank, by means of false and fraudulent
pretenses, representations and promises, as further described below.

1 2. The essence of the scheme and artifice to defraud was for defendant
 2 BARBARA JO ERICSSON, while employed as a bookkeeper for the Superior Court
 3 Judges Association (SCJA), to obtain money and funds from Key Bank, without
 4 authorization, by preparing checks drawn on the checking accounts of the SCJA at Key
 5 Bank; by making those unauthorized checks payable to herself and to other individuals
 6 and entities associated with her; by forging the signatures of the Treasurer or President of
 7 the SCJA on the unauthorized checks; and by causing those unauthorized checks to
 8 thereafter be paid by Key Bank from the checking accounts of the SCJA, thereby
 9 permitting BARBARA JO ERICSSON to fraudulently obtain from the checking accounts
 10 of the SCJA at Key Bank approximately \$451,909.16 for her own benefit and purposes.

11 **B. Manner and Means of the Scheme and Artifice**

12 The manner and means used to accomplish the scheme and artifice to defraud
 13 included the following:

14 3. It was part of the scheme and artifice to defraud that defendant BARBARA
 15 JO ERICSSON, while employed as a bookkeeper for the Superior Court Judges
 16 Association, without permission or authorization from the SCJA, prepared and caused to
 17 be prepared checks drawn on the checking accounts of the SCJA at Key Bank.

18 4. It was further part of the scheme and artifice to defraud that defendant
 19 BARBARA JO ERICSSON, in the course of preparing the foregoing unauthorized
 20 checks, caused those checks to be made payable to herself and to other individuals, banks,
 21 companies and entities associated with her, specifically, the American Automobile
 22 Association (AAA), Athletes Unlimited NW LLC (AUNW), Bank of America, E.F.,
 23 HSBC Bank, S.S., Sound Credit Union (SCU), S.F., South Sound Bank (SSBC), State
 24 Farm Insurance Company, Sports Unlimited NW LLC (SUNW), and the Washington
 25 State Employees Credit Union (WESCU).

26 5. It was further part of the scheme and artifice to defraud that defendant
 27 BARBARA JO ERICSSON, after preparing the foregoing unauthorized checks, forged
 28

1 and caused to be forged the signatures of the then-current Treasurer or President of the
2 SCJA on the signature lines of those unauthorized checks.

3 6. It was further part of the scheme and artifice to defraud that defendant
4 BARBARA JO ERICSSON, after forging and causing to be forged the foregoing
5 unauthorized checks, caused those checks to be submitted to and paid by Key Bank.

6 7. It was further part of the scheme and artifice to defraud that in or about
7 March 2010, defendant BARBARA JO ERICSSON provided to the SCJA a
8 chronological check register, called a "Register Report." The Register Report purported
9 to list the true and correct payees of all checks drawn on the checking account of the
10 SCJA at Key Bank since May 2008. In truth and fact, as defendant then well knew, the
11 Register Report failed to disclose the true payees of the unauthorized checks prepared by
12 defendant as part of the scheme.

13 8. It was further part of the scheme and artifice to defraud that defendant
14 BARBARA JO ERICSSON thereby fraudulently submitted for payment to Key Bank
15 approximately 136 unauthorized checks drawn on the accounts of the SCJA at Key Bank,
16 and fraudulently obtained and caused to be obtained approximately \$451,909.16 in money
17 and funds from Key Bank, which defendant then used for her own benefit and purposes.

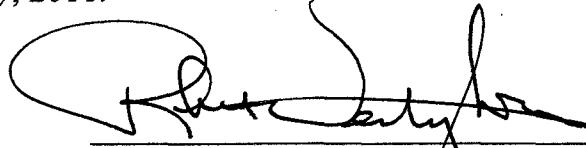
18 **C. Execution of the Scheme and Artifice to Defraud**

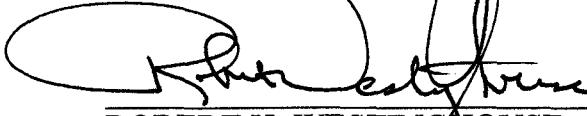
19 9. On or about the dates listed below, within the Western District of
20 Washington, for the purpose of executing and attempting to execute the foregoing scheme
21 and artifice to defraud Key Bank, and to obtain moneys, funds, and credits under the
22 custody and control of Key Bank by means of material false and fraudulent pretenses,
23 representations and promises, BARBARA JO ERICSSON, also known as Barbara Jo
24 Fulton, did knowingly and willfully cause the following unauthorized checks drawn on
25 the accounts of SCJA at Key Bank to be paid from those accounts, with each check
26 constituting a representative transaction in the scheme and a separate Count of this
27 Information:

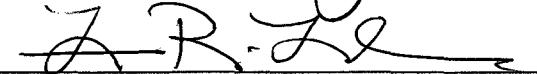
<u>Count</u>	<u>Date of Check</u>	<u>Check Number</u>	<u>Payee</u>	<u>Check Amount</u>
One	March 25, 2007	8341	AAA	\$19,926.16
Two	July 15, 2008	8633	AUNW	\$10,000
Three	November 24, 2009	8958	Barbara Fulton	\$5,615.33

All in violation of Title 18, United States Code, Section 1344 and Section 2.

DATED this 19th day of May, 2011.


JENNY A. DURKAN
United States Attorney


ROBERT H. WESTINGHOUSE
Assistant United States Attorney


LAWRENCE LINCOLN
Assistant United States Attorney